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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: CATHODE RAY TUBE (CRT)
ANTITRUST LITIGATION

This Document Relates To:

Costco Wholesale Corporation v. Hitachi,
Ltd., et al., No. 3:11-cv-06397-SC

Master File Case No. 3:07-cv-05944-SC

MDL No. 1917

Individual Case No. 3:11-cv-06397-SC

**DECLARATION OF DAVID J. BURMAN IN
SUPPORT OF COSTCO WHOLESALE
CORPORATION'S OPPOSITION TO (1)
DEFENDANTS' JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT ON DUE
PROCESS GROUNDS AND (2) DEFENDANTS'
JOINT MOTION FOR PARTIAL SUMMARY
JUDGMENT ON CHOICE OF LAW
GROUNDS**

The Honorable Samuel Conti

1 I, David J. Burman, declare as follows:

2 I am an attorney at the law firm Perkins Coie LLP, counsel of record for Plaintiff Costco
3 Wholesale Corporation (“Costco”) in this action. This declaration is submitted in support of
4 Costco’s Opposition to: (1) Defendants’ Joint Motion for Partial Summary Judgment on Due
5 Process Grounds; and (2) Defendants’ Joint Motion for Partial Summary Judgment on Choice of
6 Law Grounds. The facts set forth here are based on my personal knowledge.

7 1. Attached hereto as **Exhibit 1** is a true and correct copy of the document produced by
8 defendant Koninklijke Philips Electronics N.V. a/k/a Royal Philips Electronics (“Philips”) in the
9 above captioned matter , and identified as PHLP-CRT-144478-585.

10 2. Attached hereto as **Exhibit 2** is a true and correct copy of LG Electronics, Inc. and LG
11 Electronics U.S.A., Inc.’s Second Supplemental Objections and Responses to DAPs’ First
12 Interrogatories, served on October 17, 2014, in the above captioned matter.

13 3. Attached hereto as **Exhibit 3** is a true and correct copy of the document produced by
14 defendant LG Electronics, Inc. in the above captioned matter, and identified as LGE00092012-
15 018.

16 4. Attached hereto as **Exhibit 4** is a true and correct copy of the document produced by
17 defendant Chunghwa Picture Tubes, Ltd., (“Chunghwa”) in the above captioned matter, and
18 identified as CHU00020660 with translation.

19 5. Attached hereto as **Exhibit 5** is a true and correct copy of the document produced by
20 Philips in the above captioned matter, and identified as PHLP-CRT-048827-828.

21 6. Attached hereto as **Exhibit 6** is a true and correct copy of the document produced by
22 Chunghwa in the above captioned matter, and identified as CHU00028897-898 with translation.

23 7. Attached hereto as **Exhibit 7** is a true and correct copy of the document produced by
24 Chunghwa in the above captioned matter, and identified as CHU00031174-175 with translation.

25 8. Attached hereto as **Exhibit 8** is a true and correct copy of the document produced by
26 Chunghwa in the above captioned matter, and identified as CHU00029235-237 with translation.

9. Attached hereto as **Exhibit 9** is a true and correct copy of the document produced by Chunghwa in the above captioned matter, and identified as CHU00031178-179 with translation.

10. Attached hereto as **Exhibit 10** is a true and correct copy of the document produced by Chunghwa in the above captioned matter, and identified as CHU00030701-704 with translation.

11. Attached hereto as **Exhibit 11** is a true and correct copy of the document produced by Philips in the above captioned matter, and identified as PHLP-CRT-008309-310 with translation.

12. Attached hereto as **Exhibit 12** is a true and correct copy of the document produced by Chunghwa in the above captioned matter, and identified as CHU00031010-012 with translation.

13. Attached hereto as **Exhibit 13** is a true and correct copy of the document produced by Chunghwa in the above captioned matter, and identified as CHU00660324-328 with translation.

14. Attached hereto as **Exhibit 14** is a true and correct copy of the document produced by defendant Samsung SDI Co. Ltd. ("Samsung") in the above captioned matter, and identified as SDCRT-0086512 with translation.

15. Attached hereto as **Exhibit 15** is a true and correct copy of the document produced by Philips in the above captioned matter, and identified as PHLP-CRT-097351-352.

16. Attached hereto as **Exhibit 16** is a true and correct copy of excerpts from the deposition of Kyu In Quin Choi (LPD), taken on August 25, 2014, in the above captioned matter.

17. Attached hereto as **Exhibit 17** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0007173.

18. Attached hereto as **Exhibit 18** is a true and correct copy of an excerpts from the deposition of Woong Rae Kim (SDI), taken on July 1-2, 2014, in the above captioned matter.

19. Attached hereto as **Exhibit 19** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0076953 with translation.

20. Attached hereto as **Exhibit 20** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0076954 with translation.

21. Attached hereto as **Exhibit 21** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0002588-589 with translation.

22. Attached hereto as **Exhibit 22** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0007539-553 with translation.

23. Attached hereto as **Exhibit 23** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0007615 with translation.

24. Attached hereto as **Exhibit 24** is a true and correct copy of the document produced by Samsung in this matter, and identified as SDCRT-0199834-836 with translation.

25. Attached hereto as **Exhibit 25** is a true and correct copy of the document produced by Samsung in this matter, and identified as SDCRT-0007651-653 with translation.

26. Attached hereto as **Exhibit 26** is a true and correct copy of excerpts from the deposition of Jin Kang Jung (LPD), taken on July 19, 2013, in the above captioned matter.

27. Attached hereto as **Exhibit 27** is a true and correct copy of excerpts from the deposition of Kazumasa Hirai (Hitachi), taken on February 4-6, 2014, in the above captioned matter.

28. Attached hereto as **Exhibit 28** is a true and correct copy of the document produced by defendant Hitachi Electronic Devices USA ("HEDUS") in the above captioned matter, and identified as HEDUS-CRT00162931.

29. Attached hereto as **Exhibit 29** is a true and correct copy of the document produced by defendant Hitachi Displays, Ltd. in the above captioned matter, and identified as HDP-CRT51351-353 with translation.

30. Attached hereto as **Exhibit 30** is a true and correct copy of the document produced by Samsung in the above captioned matter, and identified as SDCRT-0087177-178 with translation.

31. Attached hereto as **Exhibit 31** is a true and correct copy of the document produced by HEDUS in the above captioned matter, and identified as HEDUS-CRT00162777-779.

Executed this 23rd day of December, 2014, at Seattle, Washington.

David J. Burman